

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

RICHARD PANICHELLI

v.

CITY OF PHILADELPHIA, ET AL

---

CIVIL ACTION  
NO. 02-4814

**Defendants' Response to Plaintiff's Motion to Compel  
Answers to Plaintiff's Request for Interrogatories and  
Request for Production of Documents**

1. Denied as to the date that the discovery requests were forwarded to Defendants City of Philadelphia and Marlene Ramsay. The actual date that requests were forwarded to Defendants was on or around September 2002.
2. Denied. Defendants have now responded to Plaintiff's request for Interrogatories and Request for Production of Documents. See Letters of January 6,9 and 10, 2003 attached for your review.
3. Admitted that counsel has had numerous discussions with Plaintiff's counsel regarding discovery.
4. As Defendants have responded to Plaintiff's discovery requests, Defendants respectfully request that Plaintiff's request be denied as moot.

Respectfully submitted,

Tremelle I. Howard  
Deputy City Solicitor

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

RICHARD PANICHELLI

v.

CITY OF PHILADELPHIA, ET AL

---

CIVIL ACTION  
NO. 02-4814

Certificate of Service

I, Tremelle I. Howard, hereby certify that I have served Defendants' Response to Plaintiff's Motion to Compel on Plaintiff at the below address:

Armando A. Pandola, Jr., Esquire  
The Sterling Business Center, Suite 400  
1819 John F. Kennedy Boulevard  
Philadelphia, PA 19103-1733

Date: \_\_\_\_\_

---

TREMELLE I. HOWARD  
Deputy City Solicitor

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

RICHARD PANICHELLI

v.

CITY OF PHILADELPHIA, ET AL

---

CIVIL ACTION  
NO. 02-4814

**ORDER**

And now, this \_\_\_\_\_ day of January 2003, upon consideration of Plaintiff's Motion to Compel and Defendants' Response hereto is it is hereby ORDERED AND DECREED that Plaintiff's Motion is denied as moot.

---

J.